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*Attorneys for Intervenor Claimant  
Lucas E. Buckley as Trustee of the  
Gox Victim Bitcoin Trust*

THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC),  
Bitcoin Gold (BTG), Bitcoin SV (BSV), and  
Bitcoin Cash (BCH) seized from  
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8H  
bhx,

Defendant,

Lucas E. Buckley, as Trustee of the  
Gox Victim Bitcoin Trust,

Claimant.

Case No. 20-7811 RS

HON. RICHARD SEEBORG  
United States District Judge  
Courtroom 3

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE HEARING  
DATE AND EXTEND TIME TO  
RESPOND TO MOTION TO  
STRIKE THE VERIFIED CLAIM OF  
LUCAS E. BUCKLEY FOR LACK  
OF STANDING**

STIPULATION AND [PROPOSED] ORDER

CASE No. 20-7811 RS

COMES NOW Claimant Lucas E. Buckley, Esq., as Trustee of the Gox Victim Bitcoin Trust, by and through counsel, to apply for an extension of time to a response to Plaintiff's United States of America's Motion to Strike ("Motion").

WHEREAS, on April 4, 2022, the United States filed its Motion to Strike.

WHEREAS, Claimant's response is presently due on April 18, 2022 and a hearing is scheduled for May 19, 2022.

WHEREAS, the complexity of this motion and the concomitant expert declarations as well as limitations on staffing that were caused by the ongoing pandemic has necessitated Claimant Buckley to request this extension of time.

WHEREAS, this is the first extension requested by Claimant from this Court.

WHEREAS, this extension is sought in the interest of justice and not for delay, and no party will be prejudiced if the extension is granted.

WHEREAS, Claimant's attorney and the attorney for the United States of America have met and conferred in good faith and both consented to a mutual extension and modified briefing schedule as follows:

	Original Date	New Date
Response to Motion	April 18, 2022	May 6, 2022
Reply to Motion	April 25, 2022	June 3, 2022
Hearing Date	May 19, 2022 at 1:30pm	June 9, 2022 at 1:30pm

WHEREAS, no party opposes this request.

NOW THEREFORE, by and through their respective counsel of record, Plaintiff and Claimants hereby stipulate and agree that Claimants' response to the Motion to Strike shall be due on May 6, 2022, Plaintiff's reply shall be due on June 3, 2022, and that the hearing be scheduled for June 9, 2022 at 1:30pm.

**IT IS SO STIPULATED.**

STIPULATION AND [PROPOSED] ORDER

CASE No. 20-7811 RS

1  
2 Dated: April 15, 2022

3 **HECHT PARTNERS LLP**

4  
5 By: /s/ Kathryn Lee Boyd  
6 Maxim Price (*pro hac vice*)  
7 Kathryn Lee Boyd (SBN 189496)  
8 David L. Hecht (*pro hac vice*)

9 *Attorneys for Intervenor Claimant*  
10 *Lucas E. Buckley as Trustee of the*  
11 *Gox Victim Bitcoin Trust*

12 Dated: April 15, 2022

13 **UNITED STATES ATTORNEY'S OFFICE**

14 By: /s/David Countryman  
15 David Countryman  
16 Criminal Division, Asset Forfeiture  
17 450 Golden Gate Ave., 11th Floor  
18 San Francisco, CA 94102  
19 david.countryman@usdoj.gov  
20 415-436-7303

21 *Attorneys for United States of America*

22 **ATTESTATION:** Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing  
23 of this document has been obtained from David Countryman.

24 By: /s/ Kathryn Lee Boyd  
25 *Counsel for Claimant Lucas E. Buckley*

26  
27  
28 STIPULATION AND [PROPOSED] ORDER

**[PROPOSED] ORDER**

The Court, having considered the parties Stipulation to Continue Hearing Date and Extend Time to Respond to Motion to Strike (“Stipulation”), and good cause appearing therefor, hereby ORDERS and ADJUDGES as follows:

1. The parties’ Stipulation is GRANTED;
2. Claimant’s deadline to file a response brief to the Motion to Strike filed on April 4, 2022 is extended from April 18, 2022 to May 6, 2022.
3. The Plaintiff’s deadline to file a reply brief is extended from April 25, 2022 to June 3, 2022.
4. The hearing scheduled for May 19, 2022 is VACATED and will be held on June 9, 2022 at 1:30pm by Zoom video conference.

**SO ORDERED.**

\_\_\_\_\_  
HON. RICHARD SEEBORG  
United States District Judge

**CERTIFICATE OF SERVICE**

I, Kathryn Lee Boyd, hereby certify that on April 15, 2022, I served a true and correct copy of the above captioned document with the Clerk of the Court using the CM/ECF system, which will automatically send an e-mail notification of such filing to all counsel of record.

/s/ Kathryn Lee Boyd  
Kathryn Lee Boyd